

EDWARD H. KUBO, JR. #2499  
United States Attorney  
District of Hawaii

J. MICHAEL SEABRIGHT #3753  
Assistant U.S. Attorney  
Room 6100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: 541-2850  
Facsimile: 541-2958  
E-mail: [mike.seabright@usdoj.gov](mailto:mike.seabright@usdoj.gov)

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

JUN 27 2003

at 10 o'clock and 47 min. AM  
WALTER A.Y.H. CHINN, CLERK

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
YOSHIKI FUJIMOTO, )  
 )  
Defendant. )  
\_\_\_\_\_ )

CR. NO. **CR 03-00332 DAE**

INFORMATION

[18 U.S.C. § 1344]

INFORMATION

The United States Attorney charges that:

1. From an exact date unknown in June or July, 2002 and continuing until approximately August 14, 2002, in the District of Hawaii, Defendant Yoshiki Fujimoto (hereinafter "Fujimoto") devised a scheme and artifice to defraud Territorial Savings and City Bank, both of which are financial institutions.

2. As part of the scheme and artifice to defraud Territorial Savings and City Bank, Fujimoto did a number of things in the District of Hawaii, including the following:

a. On an exact date unknown in June or July 2002, Fujimoto spoke on the telephone with a Nigerian man. This Nigerian man offered to introduce Fujimoto to someone who could make money for Fujimoto. The Nigerian man subsequently provided Fujimoto with the name of another individual, Robert V.M. Fujimoto then had contact with Robert V.M., and was to do as instructed by Robert V.M. in return for a monetary benefit.

b. On an exact date unknown in July, 2002, Fujimoto received a check via express mail from Robert V.M. in the sum of \$245,000, payable to himself (in the name "Yoshi" Fujimoto) and appearing to be drawn on Working Class Inc.'s account at Citibank, New York, New York (\$245,000 check).

c. On approximately July 19, 2002, Fujimoto attempted to deposit the \$245,000 check into his Territorial Savings checking account. Fujimoto was told that the check was not good and was not permitted to deposit the check into his Territorial Savings' account.

d. On approximately July 29, 2002, Fujimoto opened a savings account at City Bank and endorsed and deposited the \$245,000 check into that new account.

e. On August 13 and 14, 2002, Fujimoto wired funds obtained from the \$245,000 check to New York and Indonesia. The \$245,000 cashier's check was returned by Citibank as fraudulent, and as a result City Bank suffered a loss of approximately \$100,000.

3. On or about July 29, 2002, in the District of Hawaii, Defendant Yoshiki Fujimoto did knowingly execute, and attempt to execute, a scheme and artifice to defraud City Bank, which scheme and artifice is described in Paragraphs 1 and 2 of this Information, in that Defendant Yoshiki Fujimoto fraudulently deposited the \$245,000 check payable to himself into his savings account at City Bank.

All in violation of Title 18, United States Code, Section 1344.

DATED: June 27, 2003, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

  
\_\_\_\_\_  
J. MICHAEL SEABRIGHT  
Assistant U.S. Attorney

UNITED STATES v. FUJIMOTO; Cr. No. \_\_\_\_\_;  
"INFORMATION"